

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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Georgia Arendt, Individually and as  
Special Administrator of the Estate of  
Anthony Arendt, Deceased,

Plaintiff,

v.

Case No. 1:13-cv-727-WCG

Owens-Illinois, Inc.,

Defendant.

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**DECLARATION OF BRIAN WATSON  
IN SUPPORT OF OWENS-ILLINOIS, INC.'S BILL OF COSTS**

I, Brian O. Watson, declare as follows:

1. I am an attorney with the law firm of Schiff Hardin LLP and one of the counsel in this action for Owens-Illinois, Inc. I make this declaration on my own personal knowledge in support of Owens-Illinois, Inc.'s Bill of Costs. If called to testify as to the truth of the matters stated herein, I could and would do so competently.

2. The requested costs in Owens-Illinois, Inc.'s Bill of Costs were actually paid and are a fraction of the nontaxable expenses borne by Owens-Illinois, Inc. in this action.

3. Exhibit 1 is an itemization for the requested costs in Owens-Illinois, Inc.'s Bill of Costs.

4. Exhibit 2 is documentation for the fees concerning the Anthony Arendt deposition on March 2, 2012.

5. Exhibit 3 is documentation for the fees concerning the Anthony Arendt

deposition on March 9, 2012.

6. Exhibit 4 is documentation for the fees concerning the Anthony Arendt deposition on March 12, 2012.

7. Exhibit 5 is documentation for the fees for exemplification and the costs of copies from the Clerk of Circuit Court in Brown County, Wisconsin concerning *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

8. Exhibit 6 is documentation for the fees for exemplification, postage charges, and the costs of copies necessarily obtained for use in the action; it provides the best breakdown obtainable from retained records and does not include charges for copies made solely for attorney convenience.

9. Exhibit 7 are the court orders under which Owens-Illinois, Inc. was responsible to pay Forman Perry Watkins Krutz & Tardy, LLP the costs for collecting and providing records in this action.

10. Exhibit 8 is documentation for the costs from Forman Perry Watkins Krutz & Tardy, LLP to Owens-Illinois, Inc. under the Order Establishing a Records Collection Protocol.

11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 15, 2015

Respectfully submitted,

By: /s/ Brian O. Watson

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*Attorney for Defendant*  
*Owens-Illinois, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on June 15, 2015, these papers were filed with the Clerk of the Court for the United States District Court for the Eastern District of Wisconsin using the CM/ECF system, which will send notification of such filing upon all parties who have appeared.

/s/ Brian O. Watson

Brian O. Watson

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